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## BEFORE THE ARIZONA CORPORATION COMMISSION

## **COMMISSIONERS**

DOUG LITTLE, Interim Chairman BOB STUMP ROBERT BURNS TOM FORESE 2016 JAN 27 P 3: 56

AZ CORP COMMISSION DOCKET CONTROL

IN THE MATTER OF THE APPLICATION
OF UNS ELECTRIC, INC. FOR THE
ESTABLISHMENT OF JUST AND
REASONABLE RATES AND CHARGES
DESIGNED TO REALIZE A REASONABLE)
RATE OF RETURN ON THE FAIR VALUE
OF THE PROPERTIES OF UNS ELECTRIC,
INC. DEVOTED TO ITS OPERATIONS
THROUGHOUT THE STATE OF
ARIZONA, AND FOR RELATED
APPROVALS.

Docket No. E-04204A-15-0142

Arizona Corporation Commission

DOCKETED

JAN 27 2016

DOCKETED BY

## RESPONSE TO ARIZONA UTILITY RATEPAYER ALLIANCE'S MOTION TO EXTEND PROCEDURAL SCHEDULE

The Arizona Community Action Association (ACAA) is providing notice that it supports the Arizona Utility Ratepayer Alliance's (AURA) motion to extend the procedural schedule in the above matter, based on the reasons articulated in their motion.

Unisource Electric's (UNSE) rebuttal testimony, filed on January 19<sup>th</sup>, 2016, proposed a radically new rate design. This proposal would institute a three-part rate (electricity charge, customer charge, and demand charge), for all customers, including low-income customers. This is a significant departure from the rate design testimony filed on May 5, 2015. Staff and Intervenors were given seven months to analyze the initial proposal and prepare testimony; for

an equally complex rate design proposal, intervenors have been given only a month to perform the same task. We therefore request that the procedural schedule be extended.

Additionally, this case will offer guidance on future rate cases for Tucson Electric Power (TEP) and Arizona Public Service (APS), one currently underway and the other to be filed this year that will directly affect low-income households across the state of Arizona. Moreover, many interest groups and organizations have only recently realized the implications and importance of this rate case on the future of rate design in the state of Arizona, and may wish to intervene in this matter. For these reasons, ACAA agrees the intervention date should be extended to include additional affected parties in this matter.

A proposal of this magnitude would clearly benefit from and has a responsibility to include public hearings. Ensuring that UNSE customers are well-aware of the proposed changes and given adequate opportunity to voice their opinion on the matter is a top priority.

Furthermore, as the changes proposed in this rate case will impact future cases and households throughout Arizona, additional hearings outside UNSE's service territory are necessary. In order for such a sweeping change to rate design to be properly considered, ratepayers need to be given the opportunity to heard in this matter.

In conclusion, ACAA supports AURA's request to extend the procedural schedule, as well as an extension of the date for intervention and public hearings on the proposed rate design changes.

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RESPECTFULLY submitted this 27<sup>th</sup> day of January, 2016.

Cynthia Zwick

Executive Director

Arizona Community Action Association

AN ORIGINAL AND THIRTEEN COPIES of the foregoing filed this 27<sup>th</sup> day of January, 2016 with:

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